

UNITED STATES OF AMERICA
NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA)	NO. 20 CR 00006
Plaintiff,)	
v.)	Honorable Judge
ROMEL MURPHY)	C.J. Williams, Presiding
Defendant)	

UNOPPOSED MOTION TO EXTEND DEADLINES FOR PLEA ENTRY AND TRIAL

NOW COMES THE DEFENDANT, Romel Murphy, by and through his attorney, Jeffrey B. Steinback, and hereby respectfully requests this Honorable Court to extend the deadlines for the entry of his plea agreement and the corresponding trial date for 60 days, or to a date later, consistent with the calendar of this Court. In support, the following is offered:

1. On February 6, 2020, Mr. Murphy was charged with wire fraud and identity theft and arraigned in this Honorable Court. On May 8th, 2020, the deadline for the entry of his plea was re-set for July, 13, 2020, due to restrictions in place for COVID-19.
2. As stated in earlier motions, Mr. Murphy and his attorney, the undersigned, fully intend to resolve this case by way of a plea agreement, obviating the need for a trial to occur.
3. Many COVID-19 restrictions are still in force in Illinois, where Mr. Murphy and defense counsel both reside. Because of these restrictions, and the difficulties precipitated by their implementation, Mr. Murphy and Mr. Steinback have not been able to meet to discuss certain aspects of the proposed plea agreement.
4. Mr. Murphy is still furloughed, and childcare remains closed, (except to the children of essential workers). Romel's wife, Trelinda, works full time. Mr. Murphy remains in charge of the daily care of his children, Clark and Rome.
5. Illinois has begun the process of re-opening slowly. Our Courts are not scheduled to re-open until September 14, 2020, but gatherings of small numbers of people will begin to take

place, with proper social distancing and precautions, (the wearing of masks is required in Illinois.) We anticipate that within the next 60 days those restrictions should be further relaxed. This will facilitate an in-person, confidential meeting between Mr. Murphy and Mr. Steinback, that is critically necessary to finalize a written plea agreement between the parties, in order to go forward on the next date, should this motion be granted.

6. Although the prior motion submitted to this Honorable Court was in good faith and intended to be our final request for an extension, no one could have anticipated the far-reaching, long term effects and ongoing impact this virus has wrought in the United States, generally, and the State of Illinois, specifically, in densely populated urban areas like Chicago and the northern areas of the state. We again wish to emphasize that no disrespect is meant to the Court by this request, it is purely necessitated by the ongoing status of Covid-19 in our area and elsewhere.
7. AUSA Kyndra Lundquist does not oppose this request to continue the deadlines for Mr. Murphy's case.

WHEREFORE, the defendant, Romel Murphy, prays for the entry of an Order granting this motion to Extend the Entry of a Plea and correspondingly to extend the trial dates, to a time after 60 days, consistent with the calendar of this Honorable Court.

Respectfully Submitted,

/s/Jeffrey B. Steinback

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